

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOUGLAS JOHNSON,)
)
Plaintiff,)
)
-vs-) No. 22-cv-03718
)
COOK COUNTY SHERIFF)
THOMAS DART, in his)
official capacity,)
ANTWAUN BACON, a CCDOC)
officer, and COOK)
COUNTY, a municipal)
corporation,)
)
Defendants.)

The ZOOM deposition of MAURICE ORR, called for examination, pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Suzanne Burke, a Certified Shorthand Reporter in the State of Illinois, on March 26, 2024, A.D., commencing at the hour of 1:01 p.m.

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1 APPEARANCES:
2 DVORAK LAW OFFICES, LLC
3 BY: MR. ADRIAN BLEIFUSS PRADOS
4 One Walker Avenue
5 Suite 204
6 Clarendon Hills, Illinois 60514
7 (630) 590-9158
8 Ableifuss@gmail.com,
9 appeared on behalf of the plaintiff;
10 COOK COUNTY STATE'S ATTORNEY
11 BY: MR. JAMES O'CONNOR
12 69 West Washington Street
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14 Chicago, Illinois 60602
15 (312) 603-1880
16 James.OConnor@cookcountysao.org,
17 appeared on behalf of the Cook County
18 defendants;

19
20 DEVORE RADUNSKY, LLC
21 BY: MR. ZACHARY STILLMAN
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25 (312) 300-4479
26 Zstillman@devoreradunsky.com,
27
28 appeared on behalf of the defendant
29 Antwaun Bacon.

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I N D E X

2

WITNESS:

PAGE

3

MAURICE ORR

4

Examination By Mr. Bleifuss Prados

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Examination By Mr. O'Connor

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Further Examination By Mr. Bleifuss Prados 24

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E X H I B I T S

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DEPOSITION EXHIBIT NOS.

PAGE

9

Exhibit 1

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NOTE: Exhibit retained by counsel

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(Witness sworn.)

MAURICE ORR,

called as a witness herein, having been first
duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. BLEIFUSS PRADOS:

Q. Good afternoon, sir. Could you please state your full name and spell it for the record?

A. It is Maurice Orr, M-a-u-r-i-c-e, last name O-r-r.

Q. Okay. And have you ever been deposed before?

A. No.

Q. Okay. Well, as the court reporter just explained, it's important that we not talk over one another, and I just reemphasize that, because it's very easy to anticipate the question that you're about to hear. And in natural conversation, we kind of jump in when there's a gap. Does that make sense?

A. Yes.

Q. So if we could, please, and I'll try my best as well, to just let the lawyer finish posing their question before you answer. Does

1 that make sense?

2 A. Yes.

3 Q. If at any point I pose a question in a
4 way that is confusing or doesn't make sense to
5 you, could you please just let me know that you
6 need to have the question reframed?

7 A. Yes.

8 Q. Otherwise I will assume that you
9 understand my question. Does that make sense?

10 A. Yes, it does.

11 Q. Sir, where are you currently sitting?

12 A. In building 2 in a room.

13 Q. Is that in the Cook County Jail complex?

14 A. Yes.

15 Q. And are you currently employed by the
16 Cook County Sheriff?

17 A. Yes.

18 Q. And what is your rank within the sheriff
19 department?

20 A. Deputy sheriff.

21 Q. And when were you -- where did you
22 attend high school?

23 A. '86.

24 Q. And where was that?

1 A. Chicago.

2 Q. And what was the high school?

3 A. John Marshall.

4 Q. And do you have any college background?

5 A. No.

6 Q. Have you ever served in the armed
7 forces?

8 A. No.

9 Q. Have you ever served with any law
10 enforcement agency other than the Cook County
11 Sheriff?

12 A. No.

13 Q. When were you hired by the Cook County
14 Sheriff?

15 A. 2017.

16 Q. Okay. And was there some probationary
17 period after you were hired?

18 A. Yes.

19 Q. And at that point did you -- after that
20 point, did you become a full deputy sheriff?

21 A. Yes.

22 Q. And that's the rank that you hold today,
23 correct?

24 A. Correct.

1 Q. Okay. What are your current duties at
2 the Sheriff's department?

3 A. Transportation.

4 Q. And what does that entail?

5 A. Transporting IICs to and from court.

6 Q. And what are IICs?

7 A. Inmates in custody.

8 Q. And is that to the court at 26th and
9 California or to other courts around Cook County?

10 A. Around Cook County and outside of.

11 Q. What were your duties -- well, before we
12 get into that, what have you done to prepare for
13 today's deposition?

14 A. Nothing too much. Just be on time.

15 Q. And have you reviewed any documents in
16 preparation for today's deposition?

17 A. No, sir.

18 Q. Have you read the complaint in this
19 lawsuit?

20 A. No, sir.

21 Q. Do you know the name of the defendant in
22 this lawsuit?

23 A. Yes, sir.

24 Q. And do you know Antwaun Bacon

1 personally?

2 A. No, sir.

3 Q. Does the name ring a bell?

4 A. No.

5 Q. So do you have any idea what this
6 lawsuit is about?

7 A. No, I do not.

8 Q. Okay. Does the name Douglas Johnson
9 ring any bell?

10 A. Yes.

11 Q. Okay. You have some recollection of
12 Mr. Johnson?

13 A. Yes, sir.

14 Q. Okay. And have you talked to any --
15 apart from the attorney for the sheriff, have you
16 talked to anybody else at the jail or the
17 Sheriff's department about this deposition?

18 A. No.

19 Q. What were your duties in the -- in July
20 of 2020, if you remember?

21 A. Well, 2020, I'm pretty sure I was
22 working on the tier or something inside the jail.

23 Q. Okay. And what does it mean to work on
24 the tier?

1 A. Can you rephrase that?

2 Q. What does it mean to work on the tier;
3 what does that involve?

4 A. Overseeing the IICs, their comings,
5 their goings, overseeing the med pass or tending
6 to their needs, I would say.

7 Q. Okay. And what is a med pass?

8 A. Medical, if the nurse comes and pass out
9 meds of some sort.

10 Q. Okay. So it's the point in the day when
11 medications are distributed?

12 A. Yes, sir.

13 Q. Okay. Do you know Dr. Patrick Ennis or
14 Ennis?

15 A. No.

16 Q. I'm sorry, I couldn't hear you.

17 A. No.

18 Q. Okay. The name doesn't ring a bell?

19 A. No.

20 Q. Okay. In preparation for today's
21 deposition, did you review any written policies
22 that the sheriff has promulgated?

23 A. No.

24 Q. Okay. I'd like to show you a document,

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1 and maybe you can help me understand it a little
2 bit more. It is Bates number -- it's Bates No. 6
3 and we're going to call it Orr Exhibit No. 1.
4 Let me just figure out how to share this.

5 (Document marked as Deposition
6 Exhibit 1 for identification.)

7 BY MR. BLEIFUSS PRADOS:

8 Q. Can you see the document I'm sharing
9 here?

10 A. Yes.

11 Q. And do you know what this is?

12 A. It says Tier Log Inquiry on it.

13 Q. Okay. And do you know what a Tier Log
14 Inquiry is?

15 A. No, sir.

16 Q. Okay. When you log in -- I'm sorry, and
17 the date we have here under officer arrival time
18 is 7/19/2020, and the division is 8. Is that
19 consistent with your recollection that on
20 July 19th you were working in division 8?

21 A. Yes, sir.

22 Q. Okay. And when you punch in, is there
23 some -- how do you indicate your arrival time?
24 Is it when you arrive at the jail or when you

1 arrive at the division?

2 A. As far as clocking in? There's a time
3 clock. I don't know at that particular time was
4 we still using fingerprint or just the ID or our
5 numbers.

6 Q. Okay. And does it seem about right that
7 you would have clocked in at about 6:00 a.m.?

8 A. Yes.

9 Q. Okay. And how long would your shift be,
10 12 hours?

11 A. At that time, if it -- 2020, I believe,
12 so 12-hour shift at that particular time.

13 Q. Do you recall working with Karen Purcell
14 during this period?

15 A. She was my supervisor at that particular
16 time.

17 Q. And what was her -- what would you be
18 doing? What would your duties have been in
19 division 8 on July 19th, 2020?

20 A. Excuse me, I didn't hear the first part.

21 Q. I'm sorry, what were your duties on
22 division 8 in July 19th of 2020?

23 A. Most likely working a tier.

24 Q. And that would be what you described

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1 before of providing security at med pass and that
2 sort of thing?

3 A. Yes, sir.

4 Q. What would your duties have been with
5 respect to -- is the term IIC?

6 A. Yes, yes, IIC.

7 Q. With respect to IICs coming and going
8 from division 8 to other parts of the jail?

9 A. If they were to leave off the jail, if
10 someone was to come get them, I mark it down in
11 my log that they were leaving out, where they was
12 going. When they come back, log them back in,
13 that sort of thing.

14 Q. Okay. And would you play any role in
15 assuring that the inmates with disabilities were
16 being safely transported?

17 A. Well, it's not my particular job to do
18 so. I can, you know, inquire or suggest; but the
19 officers that bring them and come get them, that
20 would be their particular job to do so.

21 Q. Okay. And what would you suggest in --
22 for example, an example an inmate with a cane or
23 an IIC with a cane, what would you suggest for
24 such a situation?

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1 MR. O'CONNOR: Objection to the form.

2 You may answer.

3 BY MR. BLEIFUSS PRADOS:

4 Q. You can answer.

5 A. Okay. As far as if they have a cane,
6 they are to use a cane up until a certain point
7 to walk. Once they are positioned where they
8 need to be, they can sit down; or if they're
9 sitting down at their walk of destination, then
10 they are to be supposedly handcuffed or what have
11 you.

12 Q. And that's when they arrive at their
13 destination they're handcuffed?

14 A. They should be.

15 Q. Is that because walking is difficult for
16 a person with a cane when they're in handcuffs?

17 A. Yes.

18 Q. Okay. And have you observed that on
19 previous instances, where persons with a cane are
20 handcuffed when they arrive at their destination?

21 A. One more time.

22 Q. Yeah. Have you observed that, occasions
23 when an IIC with a cane is handcuffed when they
24 arrive at their destination?

Page 14

1 A. Well, I have seen that if they are
2 handcuffed, they usually don't have a cane.

3 Q. Okay. And if they have a cane, they're
4 not handcuffed, correct?

5 A. Correct.

6 Q. And is there an option of using a
7 wheelchair for a person with a cane?

8 A. That would depend on, I believe, what's
9 in their file as far as short or long distance
10 travel, as far as cane or even a wheelchair.

11 Q. Okay. And anyone with a cane must have
12 some documentation that a cane is appropriate for
13 them, I assume; is that fair to say?

14 A. They should, yes.

15 Q. Okay. And have you ever been
16 responsible -- I think this was not your duty on
17 this day, I mean, July 19th, 2020. But have you
18 ever been responsible for transporting IICs to
19 and from different divisions?

20 A. Yes.

21 Q. Okay. And when you've been responsible
22 for that, have you followed that policy of
23 handcuffing a person with a cane once they get to
24 their destination?

Page 15

1 A. If I find out that it's in their file as
2 far as them using a cane, yes.

3 Q. Okay. Do you have any -- you indicated
4 you remember Douglas Johnson. Do you remember
5 any incident on July 19th, 2020?

6 A. If that is the incident we're speaking
7 of.

8 Q. What do you recall?

9 A. Mr. Johnson left off the tier. I can't
10 recall where he went exactly. I don't know if it
11 was a court visit or what have you. He came back
12 sometime later. What I noticed was when he did
13 come back, it appeared that he was in distress,
14 some pain, a lot of sweating, and I believe that
15 he was crying.

16 Q. Okay. Do you recall him complaining
17 about his wrists?

18 A. Yes, sir.

19 Q. And did he show you his wrists?

20 A. Yes, sir.

21 Q. And did you notice any redness or
22 anything unusual about his wrists?

23 A. Yes, sir.

24 Q. And can you describe that?

Page 16

1 A. It was just some redness from the
2 handcuffs, whether they was too tight or the way
3 his hand was positioned in the cuffs.

4 Q. Okay. And is there any way in your mind
5 that he could have faked that injury or anything
6 like that?

7 A. I don't --

8 MR. O'CONNOR: Objection to the form.

9 You may answer the question.

10 BY THE WITNESS:

11 A. I don't think so.

12 BY MR. BLEIFUSS PRADOS:

13 Q. Okay. And did he also complain to Karen
14 Purcell?

15 A. He did complain to her about, you know,
16 the situation.

17 Q. And he showed her his wrists?

18 A. Yes, he did.

19 Q. Do you recall him running his wrists
20 under cold water immediately after he got back to
21 division 8?

22 A. I can't recall that.

23 Q. Okay. Is there anything else you can
24 recall about that incident?

Page 17

1 A. No. Just when he got back and the
2 distress, like I said, the complaining of his
3 wrists and, you know, he wanting a sergeant. And
4 that's when I called Sergeant Purcell, and I
5 believe she took over from there and I think got
6 medical attention, I believe.

7 Q. And was he seen by a nurse?

8 A. I believe so.

9 Q. Okay. And I assume you don't recall
10 what the nurse did or whether any aspirin was
11 prescribed or anything like that?

12 A. No, sir.

13 Q. Okay. Do you recall working on
14 division 8 in the subsequent days and weeks?

15 A. Excuse me?

16 Q. Do you recall working in division 8 in
17 the subsequent days and weeks? I'm just not sure
18 if you were there for more than one day or what
19 your arrangement was.

20 A. Yeah, that was my home division.

21 Q. Okay. And do you recall Mr. Johnson
22 complaining about his wrists in the subsequent
23 days and weeks?

24 A. If I did see him, he mentioned his

1 wrists.

2 Q. Okay, all right. In terms of training
3 you've received -- I'm going to shop share.

4 Off of the top of your head, are you
5 familiar with Policy 708 and Policy 709 of the
6 Department of Corrections?

7 A. No, not off the top of my head, no.

8 Q. Okay. And do you know how -- when the
9 Department of Corrections communicates policies
10 or trains staff in policies, is it true that they
11 will send an email to Sheriff's personnel with
12 the attached policy?

13 A. Yeah, they should.

14 Q. And is there then a check mark that you
15 check off to indicate that you've read the
16 policy?

17 A. Yes.

18 Q. Okay. And to your knowledge, is there
19 any way that they know for sure whether staff
20 have read, have actually read, the text of the
21 policy, if you know?

22 A. I don't know.

23 Q. I'm sorry. I couldn't hear your answer.

24 A. No, sir, I don't know about that part.

Page 19

1 Q. Okay. In terms of the situation in the
2 jail in the summer of 2020, that would have been,
3 is it fair to say, the height of COVID?

4 A. Yes.

5 Q. Okay. And were IICs expected to wear
6 masks as they moved between divisions?

7 A. I don't know in terms of the height --
8 I'm not sure about at that particular time.

9 Q. Okay. Do you have any recollection of
10 Mr. Johnson complaining about an asthmatic attack
11 or anything like that on the date we discussed
12 before?

13 A. No, sir.

14 Q. Okay, all right. And have you -- did
15 you discuss Mr. Johnson's situation with any
16 personnel apart from Sergeant Purcell? When I
17 mean this situation, I mean this incident with
18 the wrists.

19 A. No.

20 Q. Did you bring it up with any superior,
21 any of your superiors, in the Department of
22 Corrections?

23 A. Just Sergeant Purcell.

24 Q. Okay, all right. I have -- oh, in terms

Page 20

1 of the protocol with a cane, how were you trained
2 and when and where to apply handcuffs to a
3 person, an IIC, with a cane?

4 A. Like I said, from my understanding, from
5 my knowledge, is that, first of all, you have to
6 find out if the cane is for short or long
7 distance. If it is for such, once they get to
8 their destination, they are to be handcuffed and
9 secured.

10 Q. Okay. And do you remember where you
11 were trained in how that's supposed to work?

12 A. I believe it was in the academy and as
13 the years went on.

14 Q. Okay.

15 A. And, you know.

16 Q. And has that been consistently what
17 you've observed is the practice at the Cook
18 County Jail?

19 A. Yes.

20 MR. BLEIFUSS PRADOS: Okay. I do not
21 have any further questions.

22 MR. O'CONNOR: Just very briefly.

23

24

1

EXAMINATION

2

BY MR. O'CONNOR:

3

Q. Good afternoon, Officer Orr.

4

A. Good afternoon.

5

Q. On the date in question, when plaintiff was brought back to the tier, did you see him in the handcuffs while he was still wearing the handcuffs?

6

A. Yes.

7

Q. Okay. And were you up close with him when you saw him in the handcuffs, when he was brought back to the tier?

8

A. Yes.

9

Q. And were you able to observe the tightness of the handcuffs?

10

A. From what -- not exactly, but because the officer took them off his self.

11

Q. Do you recall, did you notice anything unusual about the tightness of the handcuffs when he was brought back to the tier?

12

A. That as soon as the cuffs came off, he grabbed his wrists.

13

Q. Okay. Was that the only thing that you would describe as potentially unusual about the

1 tightness of the cuffs?

2 A. About the cuffs, yes.

3 Q. Okay. Did you see -- sorry. So now I'm
4 stepping back a little bit further.

5 Did you see handcuffs that were
6 applied to him when he left the tier?

7 A. I can't recall that.

8 Q. Okay. Do you recall noticing anything
9 unusual about the handcuffs that were placed on
10 him or if, in fact, they were placed on him when
11 he left the tier?

12 A. One more time.

13 Q. I apologize. That was a bit of a messy
14 question.

15 A. That's all right. I couldn't hear you.

16 Q. Do you recall if handcuffs were placed
17 on him as he left the tier?

18 A. I want to say yes.

19 Q. And do you recall there being anything
20 unusual about the tightness of the handcuffs that
21 were placed on him when he left the tier?

22 MR. BLEIFUSS PRADOS: I would just
23 object on the basis that he previously testified
24 that he wants to answer yes, so I just object on

Page 23

1 the basis of foundation.

2 But you can answer.

3 BY MR. O'CONNOR:

4 Q. Officer Orr, you can answer the
5 question.

6 A. I don't know how tight it was placed
7 once he left the tier.

8 Q. Okay. And just to clarify, do you have
9 actual recollection of him being placed in
10 handcuffs as he left the tier?

11 A. Say that louder for me.

12 Q. Sure. I just want to clarify, do you
13 have actual recollection of him being placed in
14 handcuffs when he left the tier?

15 A. Yes.

16 Q. Okay. And based on those actual
17 recollections, do you recall anything unusual
18 about the tightness of those handcuffs that he
19 was placed in when he left the tier?

20 A. No.

21 MR. BLEIFUSS PRADOS: Objection,
22 foundation.

23 You can answer. I'm sorry, I made
24 an objection, but you should answer.

Page 24

1 BY THE WITNESS:

2 A. No, not the tightness of them.

3 MR. O'CONNOR: Okay. I have no further
4 questions.

5 MR. BLEIFUSS PRADOS: Zachary.

6 MR. STILLMAN: I have nothing.

7 MR. BLEIFUSS PRADOS: Okay.

8 FURTHER EXAMINATION

9 BY MR. BLEIFUSS PRADOS:

10 Q. Sir, you testified earlier that you did
11 observe redness on his wrists when the handcuffs
12 were removed, correct?

13 A. Yes.

14 Q. And you don't change any of that
15 testimony, correct?

16 A. No.

17 MR. BLEIFUSS PRADOS: Okay. Thank you.

18 Nothing else.

19 THE REPORTER: Signature?

20 MR. O'CONNOR: Officer Orr, your
21 testimony today has completed. The only thing
22 left to determine is whether or not you wish to
23 review the transcript of your testimony prior to
24 providing signature. The only purpose for

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1 reviewing the transcript would be to correct
2 spelling or any mistakes such as that, such as,
3 if a name was misspelled. You can't change any
4 of the actual content of the transcript. But,
5 otherwise, you could waive your signature if you
6 wish and not review it prior to signing it.

7 THE WITNESS: Okay.

8 MR. O'CONNOR: Are you comfortable with
9 waiving signature today?

10 THE WITNESS: Yes.

11 MR. O'CONNOR: Okay. We will waive
12 signature.

13 (Discussion off the record.)

14 THE REPORTER: Are you ordering the
15 transcript?

16 MR. BLEIFUSS PRADOS: No, not today.

17 MR. O'CONNOR: We would be ordering the
18 transcript.

19 MR. STILLMAN: We will also order a
20 copy.

21 (Whereupon, the deposition was
22 concluded at 1:27 p.m.)

23 (Signature was waived.)

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1 STATE OF ILLINOIS)

) SS:

2 COUNTY OF C O O K)

3 I, Suzanne Burke, Illinois CSR
4 No. 084-002573, do hereby certify that MAURICE
5 ORR was duly sworn to testify the whole truth,
6 and that the foregoing deposition was recorded
7 stenographically by me and was reduced to
8 typewriting by me, and that the said deposition
9 constitutes a true record of the testimony given
10 by said witness.

11 I further certify that the
12 reading and signing of said deposition was waived
13 by the witness and his attorney.

14 I further certify that I am not
15 a relative or employee or attorney or counsel of
16 any of the parties, or a relative or employee of
17 such attorney or counsel, or financially
18 interested directly or indirectly in this action.

19 IN WITNESS WHEREOF, I have
20 hereunto set my hand and affixed my seal of
21 office at Chicago, Illinois, 3rd of April, A.D.,
22 2024.



23 Certified Shorthand Reporter

24

[03718 - believe]

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[believe - deposition]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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